

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

In Re:)	
)	
David Byron Pierce)	CASE NO. 07-11839 NLJ
Hollie Dean Pierce,)	
)	
DEBTORS.)	CHAPTER 13

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

COMES NOW the Debtors, David and Hollie Pierce, by and through their attorney, Deborah Brooks, and hereby object to the Trustee's *Motion to Dismiss*. In support of this objection, the Debtors state:

1. The Debtors admit the allegations in Paragraph #1.
2. The Debtors admit the allegations in Paragraph #2.
3. The Debtors admit the allegations in Paragraph #3.
4. According to the Trustee's *Motion to Dismiss* filed herein on January 13, 2010, the Debtors' payments are in arrears in the amount of \$8,158.31. Debtors' counsel is unable to confirm if this is correct at this time. Debtors' Counsel is attempting to obtain information from Debtors necessary to resolve this matter. If necessary, the Debtors requests that a hearing be set in order for their case to be heard.

WHEREFORE, premises considered, the Debtors respectfully request that their Chapter 13 bankruptcy case not be dismissed and that they be allowed to cure the delinquent balance due.

Respectfully submitted this 18th day of January, 2010.

DEBORAH BROOKS & ASSOCIATES, P.C.

/s/ Deborah L. Brooks
Deborah L. Brooks, OBA #015684
5500 N. Western, Suite 130
Oklahoma City, OK 73118
(405) 840-6363

ATTORNEY FOR DEBTORS

CERTIFICATE OF MAILING OR ELECTRONIC TRANSMISSION

I hereby certify that on the 18th day of January 2010, a true and correct copy of the *Objection To Trustee's Motion To Dismiss* was electronically served using CM/ECF system, namely:

Trustee: John Hardeman

Further, I certify that on the 18th day of January 2010, copies of the *Objection To Trustee's Motion To Dismiss* were forwarded via U.S. Mail, first class, postage prepaid and properly addressed to the following at the addresses shown below/or on attached matrix:

David and Hollie Pierce
6508 NW 109th
Oklahoma City, OK 73162

/s/ Deborah L. Brooks
Deborah L. Brooks